

**ATTACHMENT 1  
TO DOGGR ORDER 1109**

**SAFETY REVIEW TESTING REGIME  
FOR THE ALISO CANYON NATURAL GAS STORAGE FACILITY**

This document identifies the requirements of this comprehensive safety review that shall be completed by the Southern California Gas Company (Operator) and verified by the Department of Conservation, Division of Oil, Gas, and Geothermal Resources (Division). The Operator shall use accepted industry practices and procedures.

The Division has consulted with independent technical experts from the Lawrence Berkeley, Lawrence Livermore, and Sandia National Laboratories ("National Laboratories") to develop the requirements of this facility safety review. The National Laboratories experts independently reviewed and concurred with the testing requirements for the safety review detailed below.

This comprehensive safety review requires that each of the active injection wells in the Aliso Canyon Storage facility either pass a thorough battery of tests in order to resume gas injection or be taken out of operation and isolated from the underground gas storage reservoir. Several steps, detailed below, are required in this safety review. Documentation of all testing required under this comprehensive safety review shall be provided electronically to the Division within 72 hours of completion of a test in digital (i.e. LAS) and printed (i.e. pdf) form. All pressure tests required under this comprehensive safety review shall be witnessed by Division staff. A well that is properly plugged and abandoned in accordance with Public Resources Code section 3208 is not subject to testing under this comprehensive safety review. A well that does not pass all tests must be repaired, retested, and pass all tests, or be plug and abandoned.

**REQUIRED TESTS FOR EACH WELL IN THE FACILITY**

**Step 1:** The Operator shall perform an initial casing assessment on the well consisting of temperature and noise logs.

a. Temperature Log:

A temperature survey shall be run from the surface to the packer to measure the temperature within the wellbore. A temperature survey that demonstrates no unexplained anomalous temperature changes in the well is one indication of casing integrity.

b. Noise Log:

An acoustic sensor survey capable of detecting the sound of fluid flow will be conducted the length of the well above the packer to the surface. The survey will include stops at least every 250 feet and at the midpoint of any anomaly detected by the temperature survey. The absence of anomalous sound above the packer is an indication of well integrity

- Step 2:** The results of the Temperature Logs and Noise Logs will be independently reviewed by Division engineers. Any unexplained abnormal findings in this set of tests shall be addressed by the Operator in one of the following ways:
- Conduct further investigation and demonstrate to the Division's satisfaction that the abnormal finding is not an indicator of a lack mechanical integrity;
  - Remediate the well to the Division's satisfaction; or
  - With Division review and approval, remove the well from operation and isolate the well from the underground gas storage reservoir in accordance with Steps 4b through 7b below.

Necessary actions to remediate any abnormalities revealed by these tests will be reviewed by Division engineers. Once repairs or mitigations are completed, the Temperature Log and Noise Log must then be repeated on the well and reviewed by Division engineers to ensure that there are no additional abnormal test results and to confirm the issue was repaired.

- Step 3:** After these tests are completed on the well, and all required action has been completed, the operator shall either:
- Conduct the additional tests and evaluations on the well, outlined in Steps 4a through 7a below, in order to gain approval for injecting gas through that well; or
  - Remove the well from operation and isolate the well from the underground gas storage reservoir in accordance with Steps 4b through 7b below.

#### **REQUIRED TESTS IF A WELL IS INTENDED TO RESUME OPERATIONS**

If Temperature and Noise Logs have been completed on a well and they indicate well integrity, and the Operator designates the well to return to injection operations, then the Operator shall perform the additional testing outlined in Steps 4a through 7a. The results of these tests will be independently reviewed by Division engineers and posted publicly. Each of the following tests requires that the production tubing be removed from the well.

**Step 4a:** The Operator shall conduct a **Casing Inspection log**.

The Operator shall conduct a Casing Inspection log of the well that measures the thickness of the production casing, from the surface to the bottom of the gas storage reservoir cap rock. If the inspection reveals a reduction in wall thickness, the current minimum strength of the casing will be calculated. If the current minimum strength of the casing has diminished to the point that it cannot withstand authorized operating pressures for the well plus a built-in additional safety factor of pressure, the well has failed this test. *A passing test for a casing inspection log would show no thinning of the casing that diminishes the casing's ability to contain at least 115% of the well's maximum allowable operating pressure as authorized in the current Project Approval Letter.*

**Step 5a:** The Operator shall conduct a **Cement Bond Log** for the well.

The Operator shall conduct a Cement Bond Log (CBL) that measures the bonding between cement and the production casing of the well, and also the bonding between the annular cement and the formation. Cement should be solidly bonded to both the well's production casing and the geologic formation to ensure a seal that prevents fluids from migrating up or down the outside of the well. *A passing test for a cement bond log shows definitive bond, as demonstrated by sonic waveform,*

*between cement and casing and between cement and the gas storage formation and/or cap rock for at least 100 feet above the top of the gas storage reservoir.*

**Step 6a:** The Operator shall conduct a **Multi-Arm Caliper Inspection** of the well.

The operator shall conduct an inspection that measures any internal degradation or significant changes to the well's geometry from the surface to the top of the gas storage reservoir, using a minimum 32-arm caliper tool. If the inspection reveals a thinning or deformity of the casing, the current strength of the casing will be calculated. If the current strength of the casing has diminished, such that it cannot withstand authorized operating pressures plus a built-in safety factor of additional pressure, the well fails this inspection. *A passing test for a Multi-Arm Caliper Inspection would show no deformation or thinning of the casing that diminishes the casing from being able to properly contain at least 115% of each well's maximum operating pressure.*

**Step 7a:** The Operator will conduct a **Pressure Test** of the production casing and of the well once the production tubing has been reinstalled. The Operator may conduct the casing pressure test prior to reinstalling the production tubing. Using a digital recorder, the operator will conduct a liquid-filled positive pressure test within the production tubing of the well, and in the annular space between the production tubing and the casing, to determine the well's ability to withstand normal operating pressures. The production tubing will be isolated and then pressure tested. The annular space between tubing and casing will be pressure tested. This testing also evaluates the integrity of any packers, which seal the annular space between the tubing and casing. The pressure test will be one hour and begin at a pressure of 115% of the maximum operating pressure or the minimum yield strength of the casing and tubing, whichever is less. *A passing pressure test is a pressure loss not exceeding 10% for any 30 minute period during the hour long test.*

After conducting the above tests, the Operator will conduct any indicated remediation so that the well can pass these tests. All remediation will be subject to the review of Division engineers. The well would then be required to undergo the tests once again to demonstrate well integrity.

If the well passes the Casing Wall Thickness Inspection, the Cement Bond Log, the Multi-Arm Caliper inspection and the Pressure Test to the Division's satisfaction, then the Division may clear the well for use for gas injections and withdrawal, once the Division has authorized resumption of injection into the gas storage reservoir. As noted below, wells approved for operation will only be permitted to inject or withdraw gas through the production tubing.

**REQUIRED ACTIONS IF THE WELL IS TO BE TAKEN OUT OF OPERATION AND ISOLATED FROM THE GAS STORAGE RESERVOIR:**

If the operator elects to take a well out of service, then the following steps shall be taken to isolate the well from the gas storage reservoir:

**Step 4b:** The Operator shall confirm the presence of cement outside the well's external casing in the section of the well that prevents the movement of gas from the underground gas storage reservoir to shallower geologic zones above the gas storage reservoir. Existing cement bond logs and well construction

records may be used to make this confirmation. This confirmation requires concurrence from Division engineers.

**Step 5b:** The Operator shall install a mechanical seal or “packer” within the well’s production casing and install a mechanical plug within the well’s production tubing, if applicable. These seals shall be set in place near the bottom of the well, within the portion of the well surrounded by cement. This kind of seal is an industry standard practice for isolating a well from reservoir gases or fluids and will further protect the casing from internal gas pressure.

**Step 6b:** The Operator shall fill the well with fluid to the well’s surface in order to create appropriate downward hydrostatic pressure in the well that further contributes to the integrity of the well seal.

These measures will isolate a well from the underground gas reservoir, as confirmed by National Laboratory experts. Each of the above actions is subject to review and approval by Division Engineers.

**Step 7b:** Once the Operator has completed steps 4b, 5b, and 6b, and the seal is in place at the bottom of the well and the well is filled with fluid above the seal, the operator shall:

- a. Conduct daily gas monitoring at the surface of the non-operational well, including monitoring the area around the well perimeter and in the annular space between the plugged casing string and the outmost casing;
- b. Conduct noise log, temperature log and positive pressure test every six months;
- c. Conduct weekly monitoring of fluid levels in the well or, install and operate real-time pressure monitors that provide immediate notification to the operator when pressures deviate from normal in the well’s interior tubing and its annular space.

The above monitoring shall be reported to Division engineers and maintained as a part of the well file. Division engineers will review all submitted information for evaluation on a regular basis to ensure that the well taken out of service has maintained safety, and the operator shall take all necessary steps maintain the safety of the well.

Any well taken out of operation cannot be approved to resume operations and gas injection until the successful completion of the battery of tests outlined above in Steps 4a through 7a (Casing Wall Thickness Inspection, the Cement Bond Log, the Multi-Arm Caliper Extension and the Pressure Test) is completed. Those tests must be successfully completed within one year of completing step 6b. If a well cannot successfully complete all necessary steps required in this safety review after one year of completing step 6b, then the well shall be properly plugged and abandoned in accordance with Public Resources Code section 3208.

#### **REQUIREMENTS FOR WELLS RESUMING OPERATIONS IN ALISO CANYON**

The Division’s authorization to resume injection in the Aliso Canyon Storage Facility will be contingent on the successful completion of this comprehensive safety review. The State Oil and Gas Supervisor must confirm in writing that all wells in the facility have either completed and passed the full battery of tests required in the safety review, been taken out of service and isolated from the underground gas storage reservoir, or been properly plugged and abandoned in accordance with Public Resources Code Section 3208.